May 6, 2022

VIA ECF

Hon. Lorna G. Schofield United States District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

Re: Global Gaming Philippines, LLC v. Razon, Jr., et al., 21 Cv. 2655 (LGS) (SN)

Dear Judge Schofield:

The Parties jointly, respectfully, request that the case management conference that is scheduled for May 11, 2022, be adjourned to a date after the close of expert witness discovery.

The Court initially scheduled the case management conference in the Case Management Plan and Scheduling Order, to be held approximately fourteen days after the close of all discovery. (*See* ECF Nos. 51, 205.) The Court then extended the discovery deadline and Court adjourned the case management conference to May 11, 2022. (ECF No. 205.) The Court later extended the discovery deadlines, and expert discovery currently is scheduled to close on August 12, 2022. (ECF No. 209.) The Court again extended the fact discovery deadline to June 2, 2022. (ECF No. 224.)

Simultaneously with the filing of this letter, the parties are filing a joint letter asking that expert discovery be completed by September 30, 2022.

Application **GRANTED**. The conference scheduled for May 11, 2022 is **ADJOURNED** to **October 19, 2022**, at **4:10 p.m.** The conference will be telephonic and will occur on the following conference line: 888-363-4749, access code: 5583333. The time of the conference is approximate, but the parties shall be prepared to begin at the scheduled time. The Clerk of Court is respectfully directed to close the motion at Dkt. No. 244.

Dated: May 10, 2022

New York, New York

Liverin Co. serior leeb

United States District Judge

Respectfully submitted,

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

/s/Kevin N. Ainsworth Kevin N. Ainsworth

Barry Bohrer

Jason P.W. Halperin Kaitlyn A. Crowe Daniel T. Pascucci Joseph R. Dunn

666 Third Avenue

New York, NY 10017 T: (212) 935-3000 F: (212) 983-3115 kainsworth@mintz.com bbohrer@mintz.com jhalperin@mintz.com kacrowe@mintz.com dtpascucci@mintz.com jrdunn@mintz.com

Attorneys for Plaintiff

Global Gaming Philippines, LLC

Milbank LLP

/s/ Daniel M. Perry Daniel M. Perry

55 Hudson Yards New York, NY 10001 Telephone: (212) 530-5000

Facsimile: (212) 530-5219 dperry@milbank.com

Erin M. Culbertson

Brett P. Lowe (admitted pro hac vice)

1850 K Street, NW

Suite 1100

Washington, DC 20006

Telephone: (202) 835-7500 Facsimile: (202) 263-7586

eculbertson@milbank.com

blowe@milbank.com

Counsel to Defendants Bloomberry

Resorts and Hotels Inc. and Sureste

Properties, Inc.

Walfish & Fissell PLLC

By: /s/ Rachel Penski Fissell

Rachel Penski Fissell Daniel R. Walfish

405 Lexington Avenue, Fl 8

New York, NY 10174

Tel.: 212-672-0523

rfissell@walfishfissell.com dwalfish@walfishfissell.com

Attorneys for Defendant Enrique K.

Razon, Jr.